State of California - The Resources Agency
DEPARTMENT OF FISH AND GAME
http://www.dfg.ca.gov
601 Locust Street
Redding, CA 96001
(530) 225-2300

GRAY DAVIS, Governor

June 25, 2003

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To Tom Stokely	From Bob Williams
Co.	Co. DFG
Dept.	Phone # 225-2365
Fax # 623-5944	Fax #

Mr. Tom Stokely
Natural Resources Division
Trinity County Planning Department
Post Office Box 156
Hayfork, California 96041-0156

Dear Mr. Stokely:

Environmental Assessment/Draft Environmental Impact Report (EIR)
Trinity River Bridges Project

The Department of Fish and Game (DFG) has reviewed the subject document. The Bureau of Reclamation, Bureau of Land Management and Trinity County are proposing to modify or replace, as necessary, the existing Salt Flat, Bucktail, Poker Bar, and Biggers Road bridges across the Trinity River to accommodate possible future operational changes to the Trinity River Division of the Central Valley Project (Project). As you are aware, the DFG has participated in preconsultation meetings where potential Project impacts were identified and mitigation measures discussed. The DFG has also reviewed and commented on the administrative draft EIR for the Project. In reviewing the subject document, we find that our past comments and suggestions have been included and offer the following additional comments in our role as both a trustee and responsible agency under the California Environmental Quality Act (CEQA). a.

General Comment

The location of the Bucktail Project is given as Section 3, Township 33 North, Range 9 West, a number of times within the document. Based on the project location identified in Volume 2, Figure 1-2 (Page 1-15), it appears the Project is actually located in Section 24, Township 33 North, Range 9 West. b.

Mitigation Measures

Impact 3.3-2 Mitigation Measures SF-2b, BT-2b, PB-2b, BR-2b
These mitigation measures require the contractor to prepare an erosion and sedimentation control plan but do not require the contractor to obtain agency approval of the plan. Agency approval of the plan should be required prior to start of construction. c.

Impact 3.5-1, Mitigation Measures SF-1c, BT-1c, PB-1c, BR-1c
These mitigation measures require the contractor to prepare and implement a storm water pollution prevention plan but do not require the contractor to obtain approval of the plan from the North Coast Regional Water Quality Control Board (NCRWQCB). Approval of the plan by the NCRWQCB should be required prior to start of construction. d.

Impact 3.5-2, Mitigation Measures SF-2a, BT-2a, PB-2a, BR-2a
These mitigation measures require the contractor to prepare and implement a spill prevention and containment plan but do not require the contractor to obtain agency approval of the plan. Agency approval of the plan should be required prior to the start of construction. e.

Impact 3.6-1, Mitigation Measures SF-1g, SF-1h
These mitigation measures require that fill be "formed from washed, spawning-sized gravel between? - and four inches in diameter." The DFG recommends that the diameter of the spawning-sized gravel be between one and four inches. f.

Impact 3.6-1, Mitigation Measures PB-1, BR-1
Under these mitigation measures, no size requirement is provided for the washed, spawning-sized gravel. Again, the DFG recommends that the diameter of the spawning-sized gravel be between one and four inches. g.

Thank you for the opportunity to comment on this Project. If you have any questions regarding this information, please contact Staff Environmental Scientist Harry Rectenwald at the letterhead address or telephone (530) 225-2368.

Sincerely,

Donald Koch

DONALD B. KOCH
Regional Manager

cc: Messrs. Craig Martz, Harry Rectenwald,
Bruce Webb, Neil Manji
and Bob Williams
Department of Fish and Game
601 Locust Street
Redding, California 96001

RESPONSE TO COMMENT: 46

California Department of Fish and Game (Donald A. Koch)

46-a: Thank you for your response. Your comment has been noted. No response is required.

46-b: The comment states that the correct Section number for the Bucktail project site is 24. In reviewing the Lewiston, California U.S.G.S. quadrangle map, the correct Section number is actually 23. Thank you for your comment. The following text from the EA/Draft EIR has been revised to incorporate this change:

Executive Summary, Page ES-6 has been revised as follows

> The Bucktail Project study area is located within the Lewiston, California 7.5' USGS quadrangle, Section 23, Township 33 North, Range 9 West, MDB&M. Bucktail Bridge (Bridge No. 5C-207) is located about five miles west of Lewiston, California, where it spans the Trinity River near RM 105.

Chapter 1, Introduction, Page 1-14 has been revised as follows

> ***1.8.2 BUCKTAIL BRIDGE, RIVER MILE 105***
>
> The Bucktail project study area is located within the *Lewiston, California* 7.5' USGS quadrangle, Section 23, Township 33 North, Range 9 West, MDB&M. Bucktail Bridge (Br. No. 5C-207) is located about five (5) miles west of Lewiston, California, where it spans the Trinity River near RM 105.

Chapter 2, Description of Proposed Action and Alternatives, Page 2-2 has been revised as follows

> The Bucktail project study area is located within the *Lewiston, California* 7.5' USGS quadrangle, Section 23, Township 33 North, Range 9 West, MDB&M. Bucktail Bridge (Br. No. 5C-207) is located about five (5) miles west of Lewiston, California, where it spans the Trinity River near RM 105.

46-c: The comment states that the erosion and sedimentation control plan should be go through agency review and approval prior to the start of construction. The erosion and sedimentation control plan will be prepared as a component of the overall Storm Water Pollution Prevention Plan (SWPPP), as required by the State Water Resources Control Board (SWRCB) to support a General Construction Permit under the National Pollutant Discharge Elimination Program (NPDES). There are no current requirements that the SWPPP be subject to review and approval by a state agency. The State's general permit for discharges of storm water from construction activities requires the site owner to apply with the SWRCB via a Notice of Intent, to prepare and implement a SWPPP prior to the commencement of soil disturbing activities, and to monitor the effectiveness of the plan. The SWPPP does not have to be submitted to the SWRCB, but must be on site and available to inspectors in accordance with Section A of the General Permit. The plan must also address post-construction control of pollutants in storm water. If, during a site inspection by an

agency representative, it is evident that the project does not comply with the NPDES program, corrective measures may be issued by the agency.

46-d: The comment states that the SWPPP should go through agency review and approval prior to the start of construction. The reader is referred to response to comment 46-c.

46-e: The comment states that the spill prevention and containment plan should be subject to agency review and approval. Similar to the erosion and sedimentation control plan, the spill prevention and containment plan will be included as a component of the SWPPP. As noted in responses to comments 46-c and 46-d, there is no formal requirement that SWPPP's be subject to agency review and approval.

46-f: The comment identifies a recommendation that the diameter of the spawning-sized gravel be between 1 and 4 inches. The mitigation measures provided in Section 3.6, Fishery Resources, of the EA/Draft EIR recommend that the diameter of the spawning-sized gravel to be used during project construction range from 3/8 inch to 4 inches. Since there are no specific gravel size requirements currently in place for the Trinity River system, the rationale for selecting this range in gravel diameter size was based on the following references:

Pollock, R.D. 1969. Tehama-Colusa Canal to serve as spawning channel. Progressive Fish-Culturist 31: 123-130.

Bell, M.C. 1986. Fisheries handbook of engineering requirements and biological criteria. U.S. Army Corps of Engineers, Office of the Chief of Engineers, Fish Passage Development and Evaluation Program, Portland, Oregon.

46-g: The comment states that there is no size requirement for washed, spawning-sized gravel for the Poker Bar and Biggers Road sites. Mitigation Measure PB-1d refers to any gravel that might be temporarily placed outside of the active flow channel of the Trinity River for construction purposes and is designed to protect against potential water quality effects. Since this temporary gravel fill would be removed from the site and not placed into the active river channel, there is no need to have a gravel size requirement. For Biggers Road, Mitigation Measure BR-1e does stipulate that washed, spawning-sized gravel be between 3/8 and 4 inches in diameter. Please refer to response to comment 46-f to see the rationale for using the 3/8 to 4 inch range.

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